

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	
)	
MAHAN JANBAKHSH,)	
)	Case No. 3:22-cr-00340
a/k/a MARK JANBAKHSH,)	
)	
and STEVEN PIPER,)	
)	
)	
Defendants.)	

NOTICE OF FILING OF WITNESS LIST

Pursuant to the Court's order (Dkt. 132), Defendant Mahan "Mark" Janbakhsh hereby provides this Notice of Filing of Witness List as set forth in the order. Defendant may use the following witnesses in his case-in-chief:

1. Michael Abelow.

Defendant plans to call Mr. Abelow to testify in connection with Ron Janbakhsh, who has waived privilege with Mr. Abelow.

2. Benny Butler.

Defendant expects Mr. Butler to testify about his time with Auto Masters and his experience with Defendant.

3. Ron Hall.

Defendant expects Mr. Hall to testify in connection with Mark Janbakhsh's character.

4. Sunny Koshy.

Defendant anticipates Mr. Koshy's testimony to center around the opinions listed in his expert report.

5. Chad Martin.

Defendant anticipates Mr. Martin's testimony to center around the opinions listed in his expert report.

6. Jeff Moloch.

Defendant anticipates that Mr. Moloch's testimony will surround the AMS system and his declaration.

7. Morrie Aaron.

Mr. Morie's testimony is anticipated to surround the MCA audit reports and MCA's involvement with Auto Masters.

8. Holly Daetwyler

Ms. Daetwyler's testimony is anticipated to surround the MCA audit reports and MCA's involvement with Auto Masters

9. James Pentecost.

Defendant expects Mr. Pentecost to testify about his time with Auto Masters and his experience with Defendant.

10. David Raybin.

Defendant plans to call Mr. Raybin to testify in connection with Ron Janbakhsh, who has waived privilege with Mr. Raybin.

11. Will Smith.

Defendant expects Mr. Smith to testify in connection with Mark Janbakhsh's character.

12. Zeke Stout.

Defendant expects Mr. Stout to testify in connection with Mark Janbakhsh's character.

13. Adrian Westfield.

Defendant expects Mr. Westfield to testify about his time with Auto Masters and his experience with Defendant.

14. Clark Walton.

Defendant anticipates Mr. Walton's testimony to center around the opinions listed in his expert report.

15. Witnesses necessary to respond to and rebut the Government's case-in-chief.

Defendant does not yet know whom the Government will call in its case and, as such, reserves the right to call rebuttal witnesses necessary to respond to it.

16. Witnesses necessary for purposes of impeachment.

Defendant specifically reserves the right to call any and all witnesses necessary for impeaching the testimony of the Government's witnesses or evidence.

17. Mark Janbakhsh does not yet know whether he will testify in his own defense.

Date: July 7, 2025

Respectfully submitted,

/s/ J. Alex Little

J. Alex Little (TN BPR #29858)

Zachary C. Lawson (TN BPR #36092)

John R. Glover (TN BPR #37772)

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CERTIFICATE OF SERVICE

I hereby certify that on July 7, 2025, a true and correct copy of the foregoing has been served via the Court's CM/ECF system upon all counsel of record.

/s/ J. Alex Little